

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION)	MDL No. 2804
OPIATE LITIGATION)	
)	Case No. 1:17-md-2804
THIS DOCUMENT RELATES TO:)	
)	Judge Dan Aaron Polster
ALL CASES)	
)	Mag. Judge David A. Ruiz
)	
)	
)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE ITS REPLY TO CARDINAL
HEALTH'S OBJECTION TO DISCOVERY RULING NO. 14, PART 5, REGARDING
PRIVILEGE AND CARDINAL'S DENDRITE AUDIT, UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiffs seek leave of Court to file its Reply to Cardinal Health's Objection to Discovery Ruling No. 14, part 5, Regarding Privilege and Cardinal's Dendrite Audit and accompanying documents under seal. Plaintiffs file this Motion and Proposed Order to ensure compliance with CMO No. 2: Protective Order (ECF Doc. 441) and the Protective Order Re: DEA's ARCOS/DADS Database (ECF Doc. 167). Plaintiffs respectfully request the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCOS Protective Order.

WHEREFORE, Plaintiffs respectfully request the Honorable Court to grant Plaintiffs' Reply to Cardinal Health's Objection to Discovery Ruling No. 14, part 5, Regarding Privilege and Cardinal's Dendrite Audit and accompanying documents under seal.

Respectfully submitted,

s/Peter H. Weinberger

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CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

s/Peter H. Weinberger

Peter H. Weinberger

Plaintiffs' Liaison Counsel